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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | No. CR 10-0777 MHP |
| |) | |
| Plaintiff, |) | STIPULATION AND PROPOSED |
| |) | ORDER EXCLUDING TIME FROM |
| v. |) | SPEEDY TRIAL ACT CALCULATION |
| |) | (18 U.S.C. § 3161(h)(7)(A)) |
| ZHEN PAI LIU, |) | |
| |) | |
| Defendant. |) | |
| |) | |

With the agreement of the parties, and with the consent of defendant Zhen Pai Liu, the Court enters this order documenting defendant's exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), from November 22, 2010, to January 31, 2011. The parties agree, and the Court finds and holds, as follows:

1. Defendant's counsel requires time to review discovery provided by the government and to discuss the discovery and the case with her client. Accordingly, failure to grant the requested continuance would deny defendant's counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence, in this case.

2. Given these circumstances, the Court found that the ends of justice served by

1 excluding the period from November 22, 2010, to January 31, 2011, outweigh the best interest of
2 the public and the defendant in a speedy trial. Id. at § 3161(h)(7)(A).

3 3. Accordingly, and with the consent of the defendant, at the hearing on November
4 22, 2010, the Court ordered that the period from November 22, 2010, to January 31, 2011, be
5 excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

6 IT IS SO STIPULATED.

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8 DATED: December 30, 2010

_____/s/_____
JULIA MEZHINSKY JAYNE
Attorney for Defendant

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11 DATED: December 23, 2010

_____/s/_____
ANDREW P. CAPUTO
Assistant United States Attorney

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14 IT IS SO ORDERED.

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16 DATED: January 7, 2011

